

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES DEPARTMENT OF JUSTICE,)
Petitioner)
v.) Case No. 19-cv-030-LM
MICHELLE RICCO JONAS,)
Respondent)
_____)

MOTION TO STAY JUDGMENT PENDING APPEAL

Michelle Ricco Jonas (“Ricco Jonas”), by and through her attorneys, the Office of the New Hampshire Attorney General, hereby moves for a stay of the January 29, 2019 Judgment of the District Court (ECF Doc. # 19), which was entered in accordance with a January 17, 2019 Order (McCafferty, C.J.) (ECF Doc. # 18) approving a November 1, 2018 Report and Recommendation (Johnstone, M.J.) (ECF Doc. # 11). This Motion is accompanied by a supporting Memorandum of Law. Counsel for Ricco Jonas has made a good faith yet unsuccessful effort to obtain concurrence in the relief requested.

Respectfully submitted,

MICHELLE RICCO JONAS

By her attorney,

GORDON J. MacDONALD
ATTORNEY GENERAL

Date: February 28, 2019

By: /s/ Lawrence M. Edelman

Anthony J. Galdieri, Bar # 18594
Senior Assistant Attorney General
Lawrence M. Edelman, Bar # 738
Assistant Attorney General
Civil Bureau
New Hampshire Dept. of Justice
33 Capitol Street
Concord, NH 03301
(603) 271-3650
anthony.galdieri@doj.nh.gov
lawrence.edelman@doj.nh.gov

Certificate of Service

I hereby certify that a copy of the foregoing Motion to Stay Judgment Pending Appeal was served this 28^h day of February, 2019, on all counsel of record, via the ECF System.

/s/ Lawrence M. Edelman
Lawrence M. Edelman